

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

<b>IN RE:</b>	§	
	§	
<b>1001 WL, LLC,</b>	§	<b>Case No. 24-10119-smr</b>
	§	
<b>Debtor.</b>	§	<b>(Chapter 11)</b>

**KIRKLIN PROPERTIES LLC’S OBJECTION TO APPLICATION TO APPROVE  
COMPROMISE**

**TO THE HONORABLE SHAD M. ROBINSON,  
U.S. BANKRUPTCY JUDGE FOR THE WESTERN DISTRICT OF TEXAS:**

COMES NOW Kirklin Properties LLC and files this Objection (the “Objection”) to the *Application to Approve Compromise Under Federal Rule of Bankruptcy Procedure 9019 and Local Rule 9019 and for Related Relief* (the “Application”) filed by J. Patrick Lowe, Chapter 11 Trustee (the “Trustee”). In support, Kirklin Properties LLC would show the following:

Kirklin Properties LLC adopts and incorporates the arguments made by Ali Choudhri, Galleria Loop Note Holder, LLC, and BDFI, LLC to the Application to Approve Compromise Under Federal Rule of Bankruptcy Procedure 9019 and Local Rule 9019 and for Related Relief (the “Application”) filed by J. Patrick Lowe, Chapter 11 Trustee.

Kirklin Properties LLC objects to the proposed compromise and submits that it does not meet the standards for approval and it is not fair or equitable.

WHEREFORE, PREMISES CONSIDERED, Kirklin Properties LLC respectfully requests that the Bankruptcy Court deny the Application, and grant Kirklin Properties LLC such other and further relief to which they may be justly entitled.

Dated: April 16, 2025.

Respectfully submitted,

KIRKLIN LAW FIRM PLLC

By: /s/ Paul S. Kirklin

Paul S. Kirklin

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**CERTIFICATE OF SERVICE**

I hereby certify that, on the 16th day of August 2025, a true and correct copy of the foregoing document was filed via the Court's electronic e-service and will be served in accordance with the Federal Rules of Bankruptcy Procedure upon the parties identified on the attached service list via regular United States mail or electronically by the Court's ECF system to all parties registered to receive such service.

/s/ Paul S. Kirklin  
Paul S. Kirklin

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(u)See Attached

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